



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 19, 2020

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BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Jonathan Burgos et al.*, 20 Cr. ~~189~~ (VEC)

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Dear Judge Caproni:

The Government respectfully writes regarding defendant Tyrone Howard in the above-captioned case. During his presentment on or about February 6, 2020, Mr. Howard consented to detention without prejudice toward a future bail application. The Government and defense counsel for Mr. Howard have conferred and have reached a joint proposed bail package for the Court's consideration.

The parties propose that Mr. Howard be released on a bond with the following conditions, once all conditions are met: \$50,000 personal recognizance bond, co-signed by two financial responsible persons; pretrial supervision as direction by the Pretrial Services Office; travel restricted to the Southern and Eastern Districts of New York; surrender all travel documents and make no new applications; seek or maintain verifiable employment; possess no firearms, weapons, or other destructive devices; drug treatment and testing as directed by Pretrial Services; and no contact with co-defendants or any witnesses except in the presence of counsel.

The Government respectfully requests that the Court endorse this letter motion. However, if the Court would like to hold a bail hearing, the parties respectfully request that

Application GRANTED.

SO ORDERED.


Date: 03/19/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

such hearing take place telephonically. The parties are available on Friday, March 20, 2020 at the Court's convenience for such a hearing.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

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cc: David Greenfield, Esq. (via ECF)